

# EXHIBIT 5



1825 EYE STREET, N.W. SUITE 900  
WASHINGTON, DC 20006-5403  
TELEPHONE: (202) 457-0160  
FACSIMILE: (844) 670-6009  
<http://www.dickinsonwright.com>

JENNY T. SLOCUM  
[JSlocum@dickinsonwright.com](mailto:JSlocum@dickinsonwright.com)  
(202) 659-6927

April 14, 2020

Cree Stock  
17600 Yonge St  
Newmarket, ON L3Y 4Z1  
Canada  
Email: [support@creestock.com](mailto:support@creestock.com)

VIA E-MAIL

Re: Unauthorized Use of Carhartt's Trademarks on Facemasks, Clothing, and Blankets

Dear Sir/Madam:

We represent Carhartt, Inc. ("Carhartt") in intellectual property matters. Carhartt owns exclusive rights in the CARHARTT name and trademark including in connection with its stylized "C" logo as depicted below for clothing, headwear, footwear and related items (the "Carhartt Marks") in both the United States and Canada. Carhartt has made extensive use of these marks, including on clothing for over 50 years, and the marks are famous. As a result, our client has developed a significant reputation in connection with the Carhartt Marks.



It has recently come to our client's attention that you are offering for sale unauthorized CARHARTT branded products, including but not limited to facemasks, sweatshirts, and blankets. See [https://creestock.com/?s=Carhartt&post\\_type=product](https://creestock.com/?s=Carhartt&post_type=product). These counterfeit products include direct copies of Carhartt's famous C Logo and CARHARTT mark, identical use and layout of the Carhartt protected font, and direct reference to "Carhartt" as the product names on your website. Screenshots reflecting your sale and distribution of these unauthorized items are copied below and at the top of the following page (see also Exhibits):



Carhartt Punisher Premium 3D FM  
\$24.95 - \$79.95



Carhartt #3 3D FM  
\$24.95 - \$79.95



Carhartt #2 3D FM  
\$24.95 - \$79.95



Carhartt #13 3D FM  
\$24.95 - \$79.95

Cree Stock  
 April 14, 2020  
 Page 2



Carhartt Classic But Amazing High Quality ??? Baseball Jacket

4.9 (9.9k)

Select options



Carhartt Classic Personalized Custom 3D Full Print Blanket

\$74.99 - \$84.99



Carhartt Classic Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50



Carhartt Best Design Ever In Gray Personalized Custom 3D Full Print Blanket

\$74.99 - \$84.99



Carhartt Best Design Ever In Gray Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo



Carhartt Classic But Amazing In Gray Personalized Custom 3D Full Print Blanket



Carhartt Classic But Amazing In Gray Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

8.1



Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

Such unauthorized use of the Carhartt Marks is a direct and egregious infringement of our client's trademark rights. The sale and distribution of these unauthorized counterfeit products falsely labelled as Carhartt products, and containing the Carhartt Marks, creates a likelihood of confusion and will lead consumers to mistakenly believe such products were designed, manufactured and distributed by Carhartt, or on behalf of Carhartt. Our client has not approved such use of its marks.

The purpose of this letter is to demand that you **immediately** cease and desist from any further use, sales, or display of the Carhartt Marks. In this regard, we require that you provide us by no later than **April 17, 2020**, and **in writing**:

1. confirmation that you have removed these products from any and all websites, retail stores, social media accounts, and any other location currently displaying, advertising and/or selling the same or similar variations;
2. confirmation that you have ceased all sales of these unauthorized items through any retail channels, including the Cree Stock website, as well as any affiliated retail channels;

Cree Stock  
April 14, 2020  
Page 3

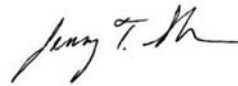
3. the identification of the designer, source, and manufacturer of these counterfeit products;
4. a full accounting of all inventory sold, the revenue collected and all inventory currently remaining in your possession bearing the Carhartt Marks; and
5. your undertaking that you will permanently refrain from any further distribution, advertisement, promotion and sale of any product bearing a Carhartt Mark or any similar variations thereof.

In addition, our client requires that you send all remaining inventory to our offices, to my attention at the address shown on this correspondence, by no later than April 22, 2020.

We have also submitted an intellectual property take down notice to your website, as well as a message via your "Contact Us" link. A copy of the submission request is included below. Your prompt cooperation is appreciated.

Please contact me with any questions.

Sincerely,



Jenny Slocum

cc: Carhartt, Inc.



Cree Stock  
April 14, 2020  
Page 4

## EXHIBITS



### SEARCH RESULTS FOR: CARHARTT

Home / Shop / Search results for "Carhartt"

Showing 1-20 of 29 results Filters +



Carhartt #9 3D FM

\$24.95 - \$79.95



Carhartt #8 3D FM

\$24.95 - \$79.95



Carhartt Punisher Premium 3D FM

\$24.95 - \$79.95



Carhartt #3 3D FM

\$24.95 - \$79.95



Carhartt #2 3D FM

\$24.95 - \$79.95



Carhartt #1 3D FM

\$24.95 - \$79.95



Carhartt Colour 3D FM

\$24.95 - \$79.95



Carhartt

\$24.95 - \$79.95



Carhartt

\$24.95 - \$79.95



BLANKET - Carhartt Color Waves  
Personalized Custom 3D Full Print  
Hoodie, T Shirt, Jacket, Pant, Polo

\$74.99 - \$84.99



Carhartt Color Waves Personalized  
Custom 3D Full Print Hoodie, T  
Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50




Carhartt And Baby Yoda Happy St.  
Patrick's Day Hoodie, T Shirt,  
Sweatshirt

\$26.95 - \$46.95

[https://creestock.com/?s=Carhartt&post\\_type=product](https://creestock.com/?s=Carhartt&post_type=product)


Cree Stock  
 April 14, 2020  
 Page 5

1
2
>




Carhartt Classic But Amazing Hoodie, T Shirt, Sweatshirt

\$26.95 - \$46.95




Carhartt Classic But Amazing Premium Quality Leather Jacket - 40% OFF

\$99.95




Carhartt Classic But Amazing High Quality ??? Baseball Jacket

\$58.99




Carhartt Classic Personalized Custom 3D Full Print Blanket

\$74.99 - \$84.99




Carhartt Classic Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50




Carhartt Best Design Ever In Gray Personalized Custom 3D Full Print Blanket

\$74.99 - \$84.99



Carhartt Best Design Ever In Gray Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50



Carhartt Classic But Amazing In Gray Personalized Custom 3D Full Print Blanket

\$74.99 - \$84.99

1
2
>

**RESULTS FROM BLOG**

[SHOW ALL BLOG RESULTS](#)

**CORPORATE**

- [Contact Us](#)
- [Privacy Policy](#)
- [DMCA](#)
- [Accessibility Use & Terms of Sale](#)

**INFORMATION**


- [Track Order](#)
- [Refund & Return](#)
- [Shipping & Delivery](#)

**MORE INFO**

- ✉ Mail: [support@creestock.com](mailto:support@creestock.com)
- ✉ Address: 17600 Yonge St, Newmarket, ON L3Y 4Z1, Canada
- ☎ Customer Service: 1-800-441-7366 (Toll Free)


[https://creestock.com/?s=Carhartt&post\\_type=product](https://creestock.com/?s=Carhartt&post_type=product)

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 April 14, 2020  
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Home / Shop / Search results for "Carhartt" / Page 2
Showing 21-29 of 29 results **Filters** +




Carhartt Classic But Amazing In Gray Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50




Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$74.99 - \$84.99




Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50




Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$74.99 - \$84.99




Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50




Carhartt Never Fade Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$59.99




Carhartt Classic But Amazing Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$59.99



Carhartt Best Design Ever Personalized Custom 3D Full Print Blanket

\$74.99 - \$84.99



Carhartt Best Design Ever Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$59.99

< 1 **2**

RESULTS FROM BLOG

SHOW ALL BLOG RESULTS

[https://creestock.com/page/2/?s=Carhartt&post\\_type=product](https://creestock.com/page/2/?s=Carhartt&post_type=product)

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Listing of the Cree Stock Campaign Url(s) contained on the Cree Stock Website:

[https://creestock.com/?s=Carhartt&post\\_type=product](https://creestock.com/?s=Carhartt&post_type=product)

Individual Product URLs:

<https://creestock.com/product/carhartt-9-3d-fm/>  
<https://creestock.com/product/carhartt-8-3d-fm/>  
<https://creestock.com/product/carhartt-punisher-premium-3d-fm/>  
<https://creestock.com/product/carhartt-3-3d-fm/>  
<https://creestock.com/product/carhartt-2-3d-fm/>  
<https://creestock.com/product/carhartt-1-3d-fm/>  
<https://creestock.com/product/carhartt-colour-3d-fm/>  
<https://creestock.com/product/carhartt-2/>  
<https://creestock.com/product/carhartt/>  
<https://creestock.com/product/blanket-carhartt-color-waves-personalized-custom-3d-full-print-hoodie-t-shirt-jacket-pant-polo/>  
<https://creestock.com/product/carhartt-color-waves-personalized-custom-3d-full-print-hoodie-t-shirt-jacket-pant-polo/>  
<https://creestock.com/product/dnh0937-2d-print/>  
<https://creestock.com/product/dnh0915-2d-print/>  
<https://creestock.com/product/0490-high-quality-leather-jacket/>  
<https://creestock.com/product/design-0158-high-quality-baseball-jacket/>  
<https://creestock.com/product/blanket-design-5522/>  
<https://creestock.com/product/design-5522/>  
<https://creestock.com/product/blanket-design-4723/>  
<https://creestock.com/product/design-4723/>  
<https://creestock.com/product/blanket-design-3915/>  
<https://creestock.com/product/design-3915/>  
<https://creestock.com/product/blanket-design-3561/>  
<https://creestock.com/product/design-3561/>  
<https://creestock.com/product/blanket-design-3113-3d-full-print/>  
<https://creestock.com/product/design-3113-3d-full-print/>  
<https://creestock.com/product/design-2417-3d-full-print/>  
<https://creestock.com/product/design-2242-3d-full-print/>  
<https://creestock.com/product/design-0905-3d-full-print-blanket/>  
<https://creestock.com/product/design-0905-3d-full-print/>

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 April 14, 2020  
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https://creestock.com/product/carhartt-9-3d-fm/ Carhartt #9 3D FM – CreeSt...

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Home / Face Mask / Carhartt #9 3D FM

**Carhartt #9 3D FM**  
**\$49.95**

Your order is SSL SECURED VISA MasterCard American Express Discover PayPal

- > Air Pollution Mask with PM 2.5 Filters made of soft material, breathable, washable and reusable.
- > With adjustable nose bridge and hook strap, fit a variety of face, easy and comfortable to wear.
- > !!! Special offers:
  - > Save 33% 5 masks & 15 filters
  - > Save 68% 10 masks & 30 filters

Combo: 5 MASKS & 15 FILTERS Clear

1 ADD TO CART

Add to wishlist

Category: Face Mask

Tag: Carhartt

Share: f t e p in

**Description** Additional information Reviews (0) Shipping & Delivery

**Specification:**  
 Material: soft fabric, mask with PM 2.5 filter  
 Color: as the picture shown

**Features:**  
 1.Soft fabric, comfortable

75% 12:51 PM 4/14/2020

<https://creestock.com/product/carhartt-9-3d-fm/>



Cree Stock  
 April 14, 2020  
 Page 9

https://creestock.com/product/design-3561/

Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Home / Worldwide / Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

**\$54.99**

\*\*NOT SOLD IN STORES\*\*  
 Tip: Free shipping for orders over \$100

SECURED VISA MASTERCARD DISCOVER PAYPAL

Style: Normal Hoodie

Size: L

Personalization Text On Front (Optional)  
 Replace Text on front of the clothes by Your Text

Your Text On Front

15 characters remaining

\$0.00

Personalization Text On Hand (Optional)  
 Replace Text on the hand of the clothes by Your Text

Your Text On Hand

15 characters remaining

\$0.00

Options amount  
**\$0.00**

Final total  
**\$54.99**

- 1 + ADD TO CART

♥ Add to wishlist

75%

12:52 PM  
 4/14/2020

<https://creestock.com/product/design-3561/>

Cree Stock  
 April 14, 2020  
 Page 10

The screenshot displays the CreeStock website interface. At the top, a browser window shows the URL <https://creestock.com/product/blanket-carhartt-color-wa>. The website header includes navigation links (CONTACT US, TRACK ORDER, DMCA (REPORT DESIGN)), the CreeStock logo, and a login/register link. A breadcrumb trail indicates the path: Home / Blanket / BLANKET - Carhartt Color Waves Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo.

The main product image shows two women holding a large black and yellow Carhartt blanket with a quilted pattern and the Carhartt logo. To the right of the image, the product title is "BLANKET - Carhartt Color Waves Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo" with a price of \$84.99. Below the price, it states "\*\*NOT SOLD IN STORES\*\*" and "Tip: Free shipping for orders over \$100". Payment options include Visa, Mastercard, American Express, Discover, and PayPal. A size selector is set to "King". A text input field for "Customer's Text (Free)" is present, with a note "15 characters remaining". The pricing section shows "Options amount \$0.00" and "Final total \$84.99". A green "ADD TO CART" button is visible. Below the button, there is a link to "Add to wishlist", categories "Blanket, Custom Front or Back", a tag "Carhartt", and social media share icons for Facebook, Twitter, Email, Pinterest, and LinkedIn.

At the bottom of the page, there is a navigation bar with tabs for "Description", "Additional information", "Reviews (0)", and "Shipping & Delivery". The "Description" tab is currently selected. A zoom level of 75% is indicated in the bottom right corner.

<https://creestock.com/product/blanket-carhartt-color-waves-personalized-custom-3d-full-print-hoodie-t-shirt-jacket-pant-polo/>



Cree Stock  
 April 14, 2020  
 Page 11

https://creestock.com/product/0490-high-quality-leather-jacket

Carhartt Classic But Amazing Premium Quality Leather Jacket - 40% OFF

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Home / Tool / Carhartt Classic But Amazing Premium Quality Leather Jacket - 40% OFF

High Quality Leather Jacket  
**40% SALE OFF**  
 \* Brown  
 \* Black

**Carhartt Classic But Amazing Premium Quality Leather Jacket - 40% OFF**  
 \$167.00 **\$99.95**  
 \*\*NOT SOLD IN STORES\*\*

SECURED VISA MasterCard DISCOVER PAYPAL

All products are made-to-order and proudly printed with the best screen printing or print to garment processes available.

**Why Buy From Us?**

- > Low Prices Everyday
- > Safe & Secure Ordering
- > Google Trusted Store
- > 90 Day's 100% Money-Back-Guarantee!
- > Award-Winning Customer Service!
- > 100% No Questions Asked Money-Back-Guarantee!
- > We Ship Worldwide / To Every Country
- > Tracking Number's Available

Limited stock available hurry and grab yours today!

Color:

Size:

**Personalization Text On Front (Optional)**  
 Replace Text on front of the clothes by Your Text  
  
 15 characters remaining  
 \$0.00

**Personalization Text On Hand (Optional)**  
 Replace Text on the hand of the clothes by Your Text

75% 1:00 PM 4/14/2020

<https://creestock.com/product/0490-high-quality-leather-jacket/>

Cree Stock  
 April 14, 2020  
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https://creestock.com/product/design-0158-high-quality- Carhartt Classic But Amazing High Quality ??? Baseball Jacket

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Home / Tool / Carhartt Classic But Amazing High Quality ??? Baseball Jacket

Carhartt Classic But Amazing High Quality ??? Baseball Jacket

\$59.99

\*\*NOT SOLD IN STORES\*\*

SECURED VISA MASTERCARD AMERICAN EXPRESS DISCOVER PAYPAL

All products are made-to-order and proudly printed with the best screen printing or print to garment processes available.

Why Buy From Us?

- > Low Prices Everyday
- > Safe & Secure Ordering
- > Google Trusted Store
- > 90 Day?s 100% Money-Back-Guarantee!
- > Award-Winning Customer Service!
- > 100% No Questions Asked Money-Back-Guarantee!?
- > We Ship Worldwide / To Every?Country
- > Tracking Number?s Available

Limited stock available hurry and grab yours today!

Color: Navy

Size: L

✖ Clear

Personalization Text On Front (Optional)

Replace Text on front of the clothes by Your Text

Your Text On Front

15 characters remaining

\$0.00

Personalization Text On Hand (Optional)

Replace Text on the hand of the clothes by Your Text

Your Text On Hand


15 characters remaining

75% 1:01 PM 4/14/2020

<https://creestock.com/product/design-0158-high-quality-baseball-jacket/>

Cree Stock  
 April 14, 2020  
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### DMCA Request:

CONTACT US TRACK ORDER DMCA (REPORT DESIGN)  Login / Register

## INTELLECTUAL PROPERTY CLAIM

[Home](#) / [DMCA](#) / [Intellectual Property Claim](#)

Campaign Url(s) (required)  
 product/blanket-design-3561/; https://creestock.com/product/design-3561/; https://creestock.com/product/blanket-design-3113-3d-full-print/; https://creestock.com/product

Your Contact Information

First Name (required)  
 Jenny

Last Name (required)  
 Slocum

Address Line 1 (required)  
 1825 I St N.W., Suite 900, Washington, D.C. 20006

States  
 District of Columbia

Country (required)  
 United States

Your Email (required)  
 JSlocum@dickinsonwright.com; CFraker@dickinsonwright.com; DWTrademarks@dickinsonwright.com

Phone Number (required)  
 202-659-6927

IP Claim Details

Are you the Rights Owner or an Agent? (required)  
☐ Rights Owner ☒ Agent

IP Owner (Legal Name)  
 Carhartt, Inc.

The specific concern is (required)

75% 3:53 PM 4/14/2020

Cree Stock  
 April 14, 2020  
 Page 14

Intellectual Property Claim | ...

File Edit View Favorites Tools Help

Convert Select

Page Safety Tools

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

**CreeStock**  
Creative. Credibility.

IP Owner (Legal Name)  
 Carhartt, Inc.

The specific concern is (required)  
 Carhartt, Inc. owns exclusive IP rights in the CARHARTT name and trademark including its stylized "C" logo for clothing, headwear, footwear and related items worldwide, includ

URL(s) to original work (required)  
 www.carhartt.com

Additional Information (Optional)  
 These products are direct counterfeit products. We request disclosure of all identifying information that Cree Stock has in its possession concerning the total inventory sold, a

**Statement**

\* I have a good faith belief that content(s) in the campaign described above violate(s) my rights described above or those held by the rights owner, and that the use of such content(s) is contrary to law.

\* I declare, under penalty of perjury, that the information completed above is correct and accurate and that I am the owner or agent of the owner of the rights described above.

☒ I have read and accept the statements above.

SUBMIT

**CORPORATE**  
 Contact Us  
 Privacy Policy  
 DMCA  
 > Acceptable Use Policy Violation  
 > Intellectual Property Claim  
 Terms of service

**INFORMATION**  
 Track Order  
 Refund & Return  
 Shipping & Delivery

**MORE INFO**  
 Mail: support@creestock.com  
 Address: 17600 Yonge St, Newmarket, ON L3Y 4Z1, Canada  
 Support Time: 8h30 AM : 5h30 PM

VISA AMEX MasterCard DISCOVER PayPal

© 2019 CreeStock.com. All rights reserved.  
 Currency: USD (US Dollar)

f t e p in

75% 3:53 PM 4/14/2020

Cree Stock  
 April 14, 2020  
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“Contact Us” Submission:

https://creestock.com/contact-us/

Contact Us | CreeStock.com

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

## CONTACT US

Home / Contact Us

Your Name (required)  
 Jenny Slocum and Carly Fraker

Your Email (required)  
 JSlocum@dickinsonwright.com; CFraker@dickinsonwright.com; DWTrademarks@dickinsonwright.com

Subject  
 Unauthorized Use of Carhartt Marks at https://creestock.com/?s=Carhartt&post\_type=product Website

Your Message

We represent Carhartt, Inc. ("Carhartt") in intellectual property matters. Carhartt owns exclusive IP rights in the CARHARTT name and trademark including its stylized "C" logo for clothing, headwear, footwear and related items worldwide, including in both the United States and Canada. Carhartt's registered US trademarks include Reg. Nos. 1193235, 4302600, 4385038, 1836639, 1841700, 3595490, 5229413. Carhartt has made extensive use of these marks on clothing for over 50 years, and the marks are famous. The seller of the Carhartt-branded products advertised and sold via the URL campaign listed above (https://creestock.com/?s=Carhartt&post\_type=product) is not authorized to do so by Carhartt. This seller is directly and egregiously infringing upon Carhartt's intellectual property rights through the marketing, sales, and distribution of these direct counterfeit products. We request disclosure of all identifying information that Cree Stock has in its possession concerning the total inventory sold, as well as the designer and source of these counterfeit products. We also request written confirmation that all counterfeit products have been removed and will no longer be sold via your website.

SEND

**CORPORATE**

- Contact Us
- Privacy Policy
- DMCA
- > Acceptable Use Policy Violation
- > Intellectual Property Claim
- Terms of service

**INFORMATION**

- Track Order
- Refund & Return
- Shipping & Delivery

**MORE INFO**

- ✉ Mail: support@creestock.com
- ✉ Address: 17600 Yonge St, Newmarket, ON L3Y 4Z1, Canada
- ✉ Support Time: 8h30 AM : 5h30 PM

VISA AMEX Mastercard DISCOVER PayPal

75% 4:00 PM 4/14/2020



1825 EYE STREET, N.W. SUITE 900  
WASHINGTON, DC 20006-5403  
TELEPHONE: (202) 457-0160  
FACSIMILE: (844) 670-6009  
<http://www.dickinsonwright.com>

JENNY T. SLOCUM  
JSlocum@dickinsonwright.com  
(202) 659-6927

April 14, 2020

Piper Mall  
Email: [support@pipermall.com](mailto:support@pipermall.com)

VIA E-MAIL

Re: Unauthorized Use of Carhartt's Trademarks on Facemasks, Clothing, and Blankets

Dear Sir/Madam:

We represent Carhartt, Inc. ("Carhartt") in intellectual property matters. Carhartt owns exclusive rights in the CARHARTT name and trademark including in connection with its stylized "C" logo as depicted below for clothing, headwear, footwear and related items (the "Carhartt Marks"). Carhartt has made extensive use of these marks, including on clothing for over 50 years, and the marks are famous. As a result, our client has developed a significant reputation in connection with the Carhartt Marks.



It has recently come to our client's attention that you are offering for sale unauthorized CARHARTT branded products, including but not limited to facemasks, sweatshirts, and blankets. See [https://pipermall.com/?s=Carhartt&post\\_type=product](https://pipermall.com/?s=Carhartt&post_type=product). These counterfeit products include direct copies of Carhartt's famous C Logo and CARHARTT mark, identical use and layout of the Carhartt protected font, and direct reference to "Carhartt" as the product names on your website. Screenshots reflecting your sale and distribution of these unauthorized items are copied below and at the top of the following page (see also Exhibits):



Carhartt #6 This Is How I Save The World  
\$24.95 - \$79.95



Carhartt #9 3D FM  
\$24.95 - \$79.95



Carhartt #8 3D FM  
\$24.95 - \$79.95



Carhartt Punisher Premium 3D FM  
\$24.95 - \$79.95



Piper Mall  
 April 14, 2020  
 Page 2



Carhartt American Warrior 3D FM

\$24.95 - \$79.95



Carhartt Personalized Custom  
 Limited Design 3D Full Print  
 Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50



Carhartt Personalized Custom  
 Classic Design 3D Full Print Hoodie,  
 T Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50



Carhartt Classic But Amazing  
 Premium Quality Leather Jacket -  
 40% OFF

\$99.95



Carhartt Classic But Amazing High  
 Quality Baseball Jacket

\$59.99



Carhartt Classic 3D Full Print  
 Blanket

\$74.99 - \$84.99



Carhartt Classic 3D Full Print  
 Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50



Carhartt Best Design Ever In Gray  
 3D Full Print Blanket

\$74.99 - \$84.99

Such unauthorized use of the Carhartt Marks is a direct and egregious infringement of our client's trademark rights. The sale and distribution of these unauthorized counterfeit products falsely labelled as Carhartt products, and containing the Carhartt Marks, creates a likelihood of confusion and will lead consumers to mistakenly believe such products were designed, manufactured and distributed by Carhartt, or on behalf of Carhartt. Our client has not approved such use of its marks.

The purpose of this letter is to demand that you **immediately** cease and desist from any further use, sales, or display of the Carhartt Marks. In this regard, we require that you provide us by no later than **April 17, 2020**, and **in writing**:

1. confirmation that you have removed these products from any and all websites, retail stores, social media accounts, and any other location currently displaying, advertising and/or selling the same or similar variations;
2. confirmation that you have ceased all sales of these unauthorized items through any retail channels, including the Piper Mall website, as well as any affiliated retail channels;



Piper Mall  
April 14, 2020  
Page 3

3. the identification of the designer, source, and manufacturer of these counterfeit products;
4. a full accounting of all inventory sold, the revenue collected and all inventory currently remaining in your possession bearing the Carhartt Marks; and
5. your undertaking that you will permanently refrain from any further distribution, advertisement, promotion and sale of any product bearing a Carhartt Mark or any similar variations thereof.

In addition, our client requires that you send all remaining inventory to our offices, to my attention at the address shown on this correspondence, by no later than April 22, 2020.

We have also submitted an intellectual property take down notice to your website, as well as a message via your "Contact Us" link. A copy of the submission request is included below. Your prompt cooperation is appreciated.

Please contact me with any questions.

Sincerely,



Jenny Slocum

cc: Carhartt, Inc.

Piper Mall  
 April 14, 2020  
 Page 4

## EXHIBITS

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) **Pipermall** Login / Register

### SEARCH RESULTS FOR: CARHARTT

Home / Shop / Search results for "Carhartt" Showing 1-20 of 27 results Filters +

Carhartt #6 This Is How I Save The World  
\$24.95 - \$79.95

Carhartt #9 3D FM  
\$24.95 - \$79.95

Carhartt #8 3D FM  
\$24.95 - \$79.95

Carhartt Punisher Premium 3D FM  
\$24.95 - \$79.95

Carhartt #2 3D FM  
\$24.95 - \$79.95

Carhartt #1 3D FM  
\$24.95 - \$79.95

Carhartt Colour 3D FM  
\$24.95 - \$79.95

Carhartt American Flag 3D FM  
\$24.95 - \$79.95

NAME CAN BE CUSTOM

NAME CAN BE CUSTOM

40% SALE OFF

75% 2:33 PM 4/14/2020

[https://pipermall.com/?s=Carhartt&post\\_type=product](https://pipermall.com/?s=Carhartt&post_type=product)

Piper Mall  
 April 14, 2020  
 Page 5

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) ✓

**Pipermall**  
Creative - Diversified

Login / Register

Carhartt American Warrior 3D FM  
\$24.95 - \$79.95

Carhartt Personalized Custom Limited Design 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo  
\$34.99 - \$99.50

Carhartt Personalized Custom Classic Design 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo  
\$34.99 - \$99.50

Carhartt Classic But Amazing Premium Quality Leather Jacket - 40% OFF  
\$99.95

Carhartt Classic But Amazing High Quality \_ Base Ball Jacket  
\$59.99

Carhartt Classic 3D Full Print Blanket  
\$74.99 - \$84.99

Carhartt Classic 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo  
\$34.99 - \$99.50

Carhartt Best Design Ever In Gray 3D Full Print Blanket  
\$74.99 - \$84.99

75% 2:34 PM 4/14/2020

[https://pipermall.com/?s=Carhartt&post\\_type=product](https://pipermall.com/?s=Carhartt&post_type=product)

Piper Mall  
April 14, 2020  
Page 6

The screenshot displays a web browser window with the URL [https://pipermall.com/page/2/?s=Carhartt&post\\_type=pr](https://pipermall.com/page/2/?s=Carhartt&post_type=pr). The browser's address bar shows the search results for "Carhartt...". The website header includes navigation links: CONTACT US, TRACK ORDER, DMCA (REPORT DESIGN), and a Login/Register link. The main heading reads "SEARCH RESULTS FOR: CARHARTT". Below this, a breadcrumb trail indicates the user is on the Home / Shop / Search results for "Carhartt" / Page 2. The results section shows four Carhartt products, each with a 3D full print design. The first three products are hoodies, T-shirts, jackets, pants, and polos, priced between \$34.99 and \$59.99. The fourth product is a blanket, priced between \$74.99 and \$84.99. The footer contains corporate information, including contact details, privacy policy, and terms of service. It also features social media icons and a copyright notice for 2019 PiperMall.com.

https://pipermall.com/page/2/?s=Carhartt&post\_type=pr

Search Results for "Carhartt..."

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

SEARCH RESULTS FOR: CARHARTT

Home / Shop / Search results for "Carhartt" / Page 2 Showing 21-24 of 24 results Filters +

Carhartt Never Fade 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo \$34.99 - \$59.99

Carhartt Classic But Amazing 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo \$34.99 - \$59.99

Carhartt Best Design Ever 3D Full Print Blanket \$74.99 - \$84.99

Carhartt Best Design Ever 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo \$34.99 - \$59.99

1 2

**CORPORATE**  
Contact Us  
Privacy Policy  
DMCA  
> Acceptable Use Policy Violation  
> Intellectual Property Claim  
TERMS OF SERVICE

**INFORMATION**  
Track Order  
Refund & Return  
Shipping & Delivery  
TERMS OF SERVICE

**MORE INFO**  
support@pipermall.com  
Support Time: 8h30 AM : 5h30 PM  
VISA AMEX MasterCard DISCOVER PayPal

© 2019 PiperMall.com. All rights reserved.  
Currency: USD (US Dollar)  
f t e p in

75% 2:35 PM 4/14/2020

[https://pipermall.com/page/2/?s=Carhartt&post\\_type=product](https://pipermall.com/page/2/?s=Carhartt&post_type=product)

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Listing of the Piper Mall Campaign Url(s) contained on the Piper Mall Website:  
[https://pipermall.com/?s=Carhartt&post\\_type=product](https://pipermall.com/?s=Carhartt&post_type=product)

Individual Product URLs:

<https://pipermall.com/product/carhartt-8-3d-fm/>  
<https://pipermall.com/product/carhartt-punisher-premium-3d-fm/>  
<https://pipermall.com/product/carhartt-2-3d-fm/>  
<https://pipermall.com/product/carhartt-1-3d-fm/>  
<https://pipermall.com/product/carhartt-colour-3d-fm/>  
<https://pipermall.com/product/carhartt-american-flag-3d-fm/>  
<https://pipermall.com/product/carhartt-american-warrior-3d-fm/>  
<https://pipermall.com/product/design-qdn0197cus-3d-full-print/>  
<https://pipermall.com/product/design-qdn0184cus-3d-full-print/>  
<https://pipermall.com/product/0490-high-quality-leather-jacket/>  
<https://pipermall.com/product/design-0158-high-quality-baseball-jacket/>  
<https://pipermall.com/product/blanket-design-5522/>  
<https://pipermall.com/product/design-5522/>  
<https://pipermall.com/product/blanket-design-4723/>  
<https://pipermall.com/product/design-4723/>  
<https://pipermall.com/product/blanket-design-3915/>  
<https://pipermall.com/product/design-3915/>  
<https://pipermall.com/product/blanket-design-3561/>  
<https://pipermall.com/product/design-3561/>  
<https://pipermall.com/product/blanket-design-3113-3d-full-print/>  
<https://pipermall.com/product/design-3113-3d-full-print/>  
<https://pipermall.com/product/design-2417-3d-full-print/>  
<https://pipermall.com/product/design-2242-3d-full-print/>  
<https://pipermall.com/product/design-0905-3d-full-print-blanket/>  
<https://pipermall.com/product/design-0905-3d-full-print/>



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https://pipermall.com/product/carhartt-1-3d-fm/ Carhartt #1 3D FM – PiperM...

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Home / Face Mask / Carhartt #1 3D FM

**Carhartt #1 3D FM**  
**\$49.95**

Usually, one filter can be used for 30 days, It is recommended to change at any time during heavy pollution periods

Filter Activated Carbon PM 2.5 FM

SECURED VISA MASTERCARD DISCOVER PAYPAL

Combo: 5 MASKS & 15 FILTERS  
 Clear

1 ADD TO CART

Add to wishlist

Category: Face Mask

Tag: Carhartt

Share: f t e p in

**Description** Additional information Reviews (0) Shipping & Delivery

Usually, one filter can be used for 30 days, It is recommended to change at any time during heavy pollution periods

**Filter Activated Carbon PM 2.5 FM**

Filter Activated Carbon?PM 2.5 FM. Do you have problem with dust chemicals, smoke and particles. Do you want to enjoy a free outdoor life? Common Filter? It has no effect. Moving purifying respirator? It is large and burden. That's a good reason to buy this Filter Activated Carbon PM 2.5 FM. Refused to be a human vacuum cleaner. A must-have for outdoor activity suitable for dust, anti-vehicle exhaust, anti-pollen allergy, PM2.5, for cycling, hiking, skiing, and other outdoor activities.

75% 2:37 PM 4/14/2020

<https://pipermall.com/product/carhartt-1-3d-fm/>

Piper Mall  
 April 14, 2020  
 Page 9

https://pipermall.com/product/design-qdn0197cus-3d-fu Carhartt Personalized Custo...

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Home / Tool / Carhartt Personalized Custom Limited Design 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

Carhartt Personalized Custom Limited Design 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

**\$54.99**

\*\*NOT SOLD IN STORES\*\*  
 Tip: Free shipping for orders over \$100

Style: Normal Hoodie

Size: L

\*YOUR NAME  
 Example: Your Name  
 12 characters remaining  
 Please provide the name and number you want.

Options amount  
**\$0.00**  
 Final total  
**\$54.99**

ADD TO CART

Add to wishlist

Size Guide

Categories: Apparel . Tool

75% 2:38 PM 4/14/2020

<https://pipermall.com/product/design-qdn0197cus-3d-full-print/>



Piper Mall  
 April 14, 2020  
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https://pipermall.com/product/design-5522/ Carhartt Classic 3D Full Prin...

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Home / Apparel / Carhartt Classic 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

Carhartt Classic 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

**\$54.99**

\*\*NOT SOLD IN STORES\*\*  
 Tip: Free shipping for orders over \$100

SECURED VISA MASTERCARD AMERICAN EXPRESS DISCOVER PAYPAL

Style: Normal Hoodie

Size: L

✖ Clear

- 1 + ADD TO CART

♥ Add to wishlist

Categories: A-League, Apparel

Tag: Carhartt

Share: f t e p in

**Description** Additional information Reviews (0) Shipping & Delivery

When you have your correct measurements, you can easily Find Your Size

- > Because of lighting and display, there will be a little color difference, please understand.
- > Item Material: Tixi (Cotton 35% + PE 65%). We won't accept changing/refunding request if you just do not like this material

YOU MAY ALSO LIKE...

75% 2:39 PM 4/14/2020

<https://pipermall.com/product/design-5522/>

Piper Mall  
April 14, 2020  
Page 11

The screenshot displays the Piper Mall website interface. At the top, the browser address bar shows the URL <https://pipermall.com/product/blanket-design-4723/>. The website header includes navigation links: CONTACT US, TRACK ORDER, DMCA (REPORT DESIGN), and the Pipermall logo with the tagline 'Creative - Diversified'. A 'Login / Register' link is also present. Below the header, a breadcrumb trail reads: Home / Blanket / Carhartt Best Design Ever In Gray 3D Full Print Blanket.

The main product image shows a black quilted blanket with a large yellow Carhartt logo and the text 'carhartt workwear' printed on it. To the right of the image, the product title is 'Carhartt Best Design Ever In Gray 3D Full Print Blanket' with a price of '\$84.99'. A note states '\*\*NOT SOLD IN STORES\*\*' and a tip offers 'Free shipping for orders over \$100'. Payment options for VISA, MasterCard, American Express, Discover, and PayPal are listed. A 'Size' dropdown menu is set to 'King', and a quantity selector shows '1' with an 'ADD TO CART' button.

Below the product image, there are links to 'Add to wishlist', 'Categories: A-League, Blanket', and 'Tag: Carhartt'. Social media sharing icons for Facebook, Twitter, Email, Pinterest, and LinkedIn are also provided.

The 'Description' tab is active, showing a note: 'When you have your correct measurements, you can easily Find Your Size'. Below this, two bullet points provide additional information: 'Because of lighting and display, there will be a little color difference, please understand.' and 'Item Material: Tixi (Cotton 35% + PE 65%). We won't accept changing/refunding request if you just do not like this material'.

The bottom of the page features a dark footer with a list of locations: ARIZONA, CALIFORNIA, FLORIDA, KENTUCKY, MICHIGAN, NEVADA, OHIO, TENNESSEE, TEXAS, TORONTO, and WASHINGTON DC. The page is viewed at 75% zoom, and the timestamp '2:40 PM 4/14/2020' is visible in the bottom right corner.

<https://pipermall.com/product/blanket-design-4723/>

Piper Mall  
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https://pipermall.com/product/design-0158-high-quality- Carhartt Classic But Amazing High Quality \_ Baseba Jacket

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Home / Tool / Carhartt Classic But Amazing High Quality \_ Baseba Jacket

Carhartt Classic But Amazing High Quality \_ Baseba Jacket

**\$59.99**

\*\*NOT SOLD IN STORES\*\*

SECURED VISA MASTERCARD AMERICAN EXPRESS DISCOVER PayPal

All products are made-to-order and proudly printed with the best screen printing or print to garment processes available.

**Why Buy From Us?**

- > Low Prices Everyday
- > Safe & Secure Ordering
- > Google Trusted Store
- > 90 Day? 100% Money-Back-Guarantee!
- > Award-Winning Customer Service!
- > 100% No Questions Asked Money-Back-Guarantee!
- > We Ship Worldwide / To Every?Country
- > Tracking Number?s Available

Limited stock available hurry and grab yours today!

Color: Navy

Size: L

✖ Clear

- 1 + ADD TO CART

♥ Add to wishlist

75% 2:40 PM 4/14/2020

<https://pipermall.com/product/design-0158-high-quality-baseball-jacket/>

Piper Mall  
 April 14, 2020  
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## DMCA Request

https://pipermall.com/dmca/intellectual-property-claim/

Intellectual Property Claim

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

### INTELLECTUAL PROPERTY CLAIM

Home / DMCA / Intellectual Property Claim

Campaign Url(s) (required)

mall.com/product/design-2242-3d-full-print/; https://pipermall.com/product/design-0905-3d-full-print-blanket/; https://pipermall.com/product/design-0905-3d-full-print/

Your Contact Information

First Name (required)

Jenny

Last Name (required)

Slocum

Address Line 1 (required)

1825 I St N.W., Suite 900, Washington, D.C. 20006

States

District of Columbia

Country (required)

United States

Your Email (required)

JSlocum@dickinsonwright.com

Phone Number (required)

202-659-6927

IP Claim Details

Are you the Rights Owner or an Agent? (required)

☐ Rights Owner ☒ Agent

IP Owner (Legal Name)


Carhartt, Inc.

The specific concern is (required)

.

75% 4:36 PM 4/14/2020

Piper Mall  
 April 14, 2020  
 Page 14

CONTACT US TRACK ORDER DMCA (REPORT DESIGN)  Login / Register

☐ Rights Owner ☒ Agent

IP Owner (Legal Name)  
 Carhartt, Inc.

The specific concern is (required)  
 Carhartt, Inc. owns exclusive IP rights in the CARHARTT name and trademark including its stylized "C" logo for clothing, headwear, footwear and related items worldwide, i

URL(s) to original work (required)  
 www.carhartt.com

Additional Information (Optional)  
 These products are direct counterfeit products. We request disclosure of all identifying information that Piper Mall has in its possession concerning the total inventory sold, as

**Statement**

\* I have a good faith belief that content(s) in the campaign described above violate(s) my rights described above or those held by the rights owner, and that the use of such content(s) is contrary to law.






\* I declare, under penalty of perjury, that the information completed above is correct and accurate and that I am the owner or agent of the owner of the rights described above.






☒ I have read and accept the statements above.

SUBMIT

**CORPORATE**  
 Contact Us  
 Privacy Policy  
 DMCA  
 > Acceptable Use Policy Violation  
 > Intellectual Property Claim  
 TERMS OF SERVICE

**INFORMATION**  
 Track Order  
 Refund & Return  
 Shipping & Delivery  
 TERMS OF SERVICE

**MORE INFO**  
 support@pipermall.com  
 Support Time: 8h30 AM : 5h30 PM  
    

© 2019 PiperMall.com. All rights reserved.  
 Currency: USD (US Dollar)  
    

75% 4:37 PM 4/14/2020

Piper Mall  
 April 14, 2020  
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“Contact Us” Submission:

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

## CONTACT US

Home / Contact Us

Your Name (required)  
 Jenny Slocum and Carly Fraker

Your Email (required)  
 JSlocum@dickinsonwright.com

Subject  
 Unauthorized Use of Carhartt Marks at https://pipermall.com/?s=Carhartt&post\_type=product Website

Your Message

We represent Carhartt, Inc. ("Carhartt") in intellectual property matters. Carhartt owns exclusive IP rights in the CARHARTT name and trademark including its stylized "C" logo for clothing, headwear, footwear and related items worldwide, including in both the United States and Canada. Carhartt's registered US trademarks include Reg. Nos. 1193235, 4302600, 4385038, 1836639, 1841700, 3595490, 5229413. Carhartt has made extensive use of these marks on clothing for over 50 years, and the marks are famous. The seller of the Carhartt-branded products advertised and sold via the URL campaign listed above (https://pipermall.com/?s=Carhartt&post\_type=product) is not authorized to do so by Carhartt. This seller is directly and egregiously infringing upon Carhartt's intellectual property rights through the marketing, sales, and distribution of these direct counterfeit products. We request disclosure of all identifying information that Piper Mall has in its possession concerning the total inventory sold, as well as the designer and source of these counterfeit products. We also request written confirmation that all counterfeit products have been removed and will no longer be sold via your website.

SEND

**CORPORATE**  
 Contact Us  
 Privacy Policy  
 DMCA  
 > Acceptable Use Policy Violation  
 > Intellectual Property Claim  
 TERMS OF SERVICE

**INFORMATION**  
 Track Order  
 Refund & Return  
 Shipping & Delivery  
 TERMS OF SERVICE

**MORE INFO**  
 support@pipermall.com  
 Support Time: 8h30 AM : 5h30 PM  
 VISA AMEX MasterCard DISCOVER PayPal

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75% 4:41 PM 4/14/2020